

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Plaintiff Tiffany Lewis (“Plaintiff”), by counsel, respectfully moves for a two-week extension of time, up to and including January 28, 2026 to file Plaintiff’s motion for preliminary approval of the parties’ proposed class settlement. In support, Plaintiff states:

1. The Court set January 14, 2026 as the deadline for Plaintiff to file the motion for preliminary approval of the proposed class settlement.
2. The parties have been working diligently to finalize the settlement agreement and supporting documents.
3. On December 22, 2025, defense counsel requested that Plaintiff circulate a draft settlement agreement.
4. On December 23, 2025, Plaintiff circulated a draft settlement agreement and exhibits to defense counsel for review.
5. On December 23, 2025, defense counsel acknowledged receipt and indicated that they would “review and revert.”

6. On January 6, 2026, Plaintiff followed up seeking the status of the defense review.

7. On January 7, 2026, defense counsel advised that the documents were “being reviewed by the client,” that they would follow up, and that the client was aware of the Court’s deadline.

8. On January 12, 2026, defense counsel provided a zip folder containing redline edits.

9. Given the January 12 receipt of defense edits, Plaintiff requests a brief two-week extension to incorporate the edits as appropriate, finalize the settlement documents, and file a complete preliminary approval motion.

10. This requested extension is sought in good faith and not for purposes of delay.

11. Defendant does not oppose this motion. Defense counsel confirmed on January 12, 2026 that there is no objection to a two-week extension.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Unopposed Motion and extend the deadline to file Plaintiff’s motion for preliminary approval to January 28, 2026.

RESPECTFULLY SUBMITTED AND DATED this January 12, 2026

s/ Anthony Paronich
Anthony Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (617) 485-0018
Facsimile: (508) 318-8100
Email: anthony@paronichlaw.com

Attorneys for Plaintiff and the Proposed Class

